

| Bates number | Date | Author | To | Copied | Privilege Description | Reason |
|------------------------------------|---------|-------------------|-------------------|-------------|---|--------|
| LCI PRIV 00642 – LCI PRIV 00644 | 7/27/95 | Sidney R. Bluming | Rosemary Welk | Greg LeMond | Confidential fax communication from attorney to client and client's representative for the purpose of providing legal advice regarding negotiations with Trek | AC/WP |
| LCI PRIV 00645 | 7/27/95 | Rosemary Welk | Sidney D. Bluming | | Confidential communication from client's representative to attorney for the purpose of obtaining legal advice regarding negotiations with Trek | AC/WP |
| LCI PRIV 00646 – LCI PRIV 00652 | 7/27/95 | Sidney D. Bluming | Rosemary Welk | | Confidential fax communication from attorney to client's representative for the purpose of providing legal advice regarding negotiations with Trek | AC/WP |
| LCI PRIV 00653 | 7/27/95 | Rosemary Welk | Sidney R. Bluming | | Confidential fax communication from client's representative to attorney for the purpose of obtaining legal advice regarding negotiations with Trek | AC/WP |
| LCI PRIV 00654 – LCI PRIV 00655 | 7/25/95 | Greg LeMond | Sidney R. Bluming | | Confidential fax communication from attorney to client for the purpose of rendering legal advice regarding negotiations with Trek | AC/WP |
| LCI PRIV 00656 – LCI PRIV 00658 | 7/25/95 | Sidney R. Bluming | Rosemary Welk | Greg LeMond | Confidential fax communication from attorney to client and client's representative for the purpose of obtaining legal advice regarding negotiations with Trek | AC/WP |
| LCI PRIV 00659 – LCI PRIV 00660 | 7/24/95 | Sidney D. Bluming | Greg LeMond | | Confidential fax communication from attorney to client for the purpose of providing legal advice regarding negotiations with Trek | AC/WP |
| LCI PRIV 00661 | 7/24/95 | Rosemary Welk | Sidney D. Bluming | | Confidential fax communication from attorney to client's representative for the purpose of providing legal advice regarding Renegade inventory and negotiations with Trek | AC/WP |
| LCI PRIV 00662 – LCI PRIV 00664 | 7/24/95 | Sidney D. Bluming | Rosemary Welk | | Confidential fax communication from attorney to client's representative for the purpose of providing legal advice regarding Renegade inventory and negotiations with Trek | AC/WP |
| LCI PRIV 00665 – LCI PRIV 00667 | 7/20/95 | Sidney D. Bluming | Rosemary Welk | | Confidential fax communication from attorney to client's representative for the purpose of providing legal advice regarding Renegade inventory and negotiations with Trek | AC/WP |
| LCI PRIV 00668 | 7/14/95 | Andy Gallo | Sidney D. Bluming | | Confidential e-mail communication within legal department regarding Renegade inventory and negotiations with Trek | WP |

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| LCI PRIV 00669 – LCI PRIV 00673 | 7/10/95 | Sidney D. Bluming | Greg LeMond | | Confidential letter communication from attorney to client for the purpose of providing legal advice regarding negotiations with Trek | AC/WP |
| LCI PRIV 00674 – LCI PRIV 00675 | 6/21/95 | Rosemary Welk | Sidney D. Bluming | | Confidential letter communication from client's representative to attorney for the purpose of obtaining legal advice regarding contracts with Finish Line Sportswear, Sinclair Imports, and Clark Kent | AC/WP |
| LCI PRIV 00676 – LCI PRIV 00677 | 6/6/95 | Sidney D. Bluming | Greg LeMond | | Confidential fax communication from attorney to client for the purpose of providing legal advice regarding negotiations with Trek | AC/WP |
| LCI PRIV 00678 – LCI PRIV 00679 | 5/23/95 | Sidney D. Bluming | Greg LeMond | | Confidential fax communication from attorney to client for the purpose of providing legal advice regarding negotiations with Trek | AC/WP |
| LCI PRIV 00680 – LCI PRIV 00681 | 5/23/95 | Sidney D. Bluming | Greg LeMond | | Confidential fax communication from attorney to client for the purpose of providing legal advice regarding negotiations with Trek | AC/WP |
| LCI PRIV 00682 – LCI PRIV 00686 | 5/23/95 | Sidney D. Bluming | Greg LeMond | | Confidential fax communication from attorney to client for the purpose of providing legal advice regarding negotiations with Trek | AC/WP |
| LCI PRIV 00687 – LCI PRIV 00690 | 5/22/95 | Sidney D. Bluming | Greg LeMond | | Confidential fax communication from attorney to client for the purpose of providing legal advice regarding negotiations with Trek | AC/WP |
| LCI PRIV 00691 – LCI PRIV 00695 | 5/8/95 | Sidney D. Bluming | Greg LeMond | | Confidential fax communication from attorney to client for the purpose of providing legal advice regarding negotiations with Trek | AC/WP |
| LCI PRIV 00696 | 5/8/95 | Sidney D. Bluming | Greg LeMond | | Confidential fax communication from attorney to client for the purpose of providing legal advice regarding negotiations with Trek | AC/WP |
| LCI PRIV 00697 – LCI PRIV 00702 | 1/22/98 | Sidney D. Bluming | Greg LeMond Mary Haigh | | Confidential fax communication from attorney to client and client's representative for the purpose of providing legal advice regarding Austrian trademark | AC/WP |
| LCI PRIV 00703 – LCI PRIV 00704 | 10/9/03 | Sidney D. Bluming | Mary Haigh | | Confidential letter communication from attorney to client's representative for the purpose of providing legal advice regarding Trek certificate of insurance | AC/WP |
| LCI PRIV 00705 – LCI PRIV 00707 | 1/9/03 | Dawn Yearwood | Mary Haigh Greg LeMond | | Confidential fax communication from attorney to client and client's representative for the purpose of providing legal advice regarding Trek certificate of insurance | AC/WP |
| LCI PRIV 00708 – LCI PRIV 00723 | 11/28/01 | Sidney R. Bluming | Greg LeMond Warren Gibson | | Confidential fax communication from attorney to client for the purpose of rendering legal advice regarding Trek – Saturn team | AC/WP |

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| LCI PRIV 00724 | 11/21/02 | Sidney D. Bluming | Greg LeMond | | | Confidential fax communication from attorney to client for the purpose of providing legal advice regarding Litscher v. Trek, LeMond et al. suit | AC/WP |
| LCI PRIV 00725 – LCI PRIV 00727 | 12/9/02 | Sidney D. Bluming | Greg LeMond | Warren Gibson | | Confidential fax communication from attorney to client and client's agent for the purpose of providing legal advice regarding Trek certificate of insurance | AC/WP |
| LCI PRIV 00728 – LCI PRIV 00730 | 12/10/01 | Jill Scarcia | Greg LeMond Warren Gibson | | | Confidential letter communication from attorney to client and client's agent for the purpose of providing legal advice regarding Sponsorship Agreement between Trek and Team Sports | AC/WP |
| LCI PRIV 00731 – LCI PRIV 00733 | 7/21/04 | Sidney R. Bluming | | | | Confidential attorney notes reflecting attorney's thoughts, mental impressions, legal opinions and legal advice regarding identification of potential witnesses | WP |
| LCI PRIV 00734 – LCI PRIV 00737 | 7/28/04 | Sidney R. Bluming | | | | Confidential attorney notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek | WP |
| LCI PRIV 00738 | 8/4/04 | Sidney R. Bluming | Greg LeMond | Warren Gibson | | Confidential e-mail communication from attorney to client and client's agent for the purpose of rendering legal advice regarding negotiations with Trek | AC/WP |
| LCI PRIV 00739 | 8/9/04 | Greg LeMond | Sidney R. Bluming | | | Confidential e-mail communication from client to attorney for the purpose of obtaining legal advice regarding communication with Trek | AC/WP |
| LCI PRIV 00740 | 8/8/04 | Greg LeMond | Sidney R. Bluming | | | Confidential e-mail communication from client to attorney for the purpose of obtaining legal advice regarding negotiations with Trek | AC/WP |
| LCI PRIV 00741 – LCI PRIV 00742 | 8/2004 | Sidney R. Bluming | | | | Confidential memorandum containing attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek | WP |
| LCI PRIV 00743 – LCI PRIV 00747 | 8/24/04 | Sidney R. Bluming | Martin R. Lueck Christopher W. Madel Greg LeMond | | | Confidential fax communication between attorneys with copy to client for the purpose of rendering legal advice regarding communication with Trek about Trek's notice of breach | AC/WP |

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| LCI PRIV 00748 | 8/11/04 | Sidney R. Bluming | | | Confidential attorney notes containing attorney's thoughts and mental impressions for the purpose of providing legal advice regarding negotiations with Trek | WP |
| LCI PRIV 00749 – LCI PRIV 00750 | 8/2004 | Sidney R. Bluming | | | Confidential memorandum containing attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek | WP |
| LCI PRIV 00751 | 8/11/04 | Sidney R. Bluming | Greg LeMond | | Confidential letter communication from attorney to client for the purpose of rendering legal advice regarding negotiations with Trek | AC/WP |
| LCI PRIV 00752 | 9/22/04 | Sidney R. Bluming | | | Confidential attorney notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek | WP |
| LCI PRIV 00753 | 10/18/08 | Sidney R. Bluming | | | Confidential attorney notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek | WP |
| LCI PRIV 00754 – LCI PRIV 00755 | 10/2004 | Sidney R. Bluming | | | Confidential attorney notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek | WP |
| LCI PRIV 00757 | 10/17/04 | Greg LeMond | Sidney R. Bluming | | Confidential e-mail communication from client to attorney for the purpose of obtaining legal advice regarding negotiations with Trek | AC/WP |
| LCI PRIV 00758- LCI PRIV 00776 | 10/2004 | Sidney R. Bluming | | | Confidential draft sublicense agreement containing attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek | WP |
| LCI PRIV 00777 – LCI PRIV 00784 | 10/2004 | Sidney R. Bluming | | | Confidential draft first amendment containing attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek | WP |
| LCI PRIV 00785 | 10/2004 | Sidney R. Bluming | | | Confidential attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek | WP |
| LCI PRIV 00786 – LCI PRIV 00788 | 11/12/04 | Sidney R. Bluming | Martin R. Lueck Christopher W. Madel Greg LeMond | | Confidential fax communication between attorneys with copy to client for the purpose of rendering legal advice regarding negotiations with Trek | AC/WP |

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| LCI PRIV 00789 – LCI PRIV 00792 | 11/2004 | Sidney R. Bluming | | | Confidential attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek | WP |
| LCI PRIV 00793 – LCI PRIV 00795 | 11/2004 | Sidney R. Bluming | | | Confidential attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek | WP |
| LCI PRIV 00798 – LCI PRIV 00816 | 11/2004 | Sidney R. Bluming | | | Confidential attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek | WP |
| LCI PRIV 00817 – LCI PRIV 00818 | 8/10/04 | Sidney R. Bluming | Mary Haigh | | Confidential fax communication from attorney to client's representative for the purpose of rendering legal advice regarding negotiations with Trek | AC/WP |
| LCI PRIV 00819 – LCI PRIV 00822 | 11/29/04 | Sidney R. Bluming | Christopher W. Madel Greg LeMond | | Confidential fax communication between attorneys with copy to client for the purpose of rendering legal advice regarding negotiations with Trek | AC/WP |
| LCI PRIV 00823 – LCI PRIV 00824 | 11/30/04 | Sidney R. Bluming | Christopher W. Madel | | Confidential communication between attorneys for the purpose of rendering legal advice regarding negotiations with Trek | AC/WP |
| LCI PRIV 00825 – LCI PRIV 00826 | 2/8/2005 | Sidney R. Bluming | | | Confidential attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek | WP |
| LCI PRIV 00827 – LCI PRIV 00828 | | | | | PRODUCED AT LCI 12154-12155 | |
| LCI PRIV 00829 | 2/4/05 | Sidney R. Bluming | | | Confidential attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek | WP |
| LCI PRIV 00830 | 1/25/05 | Sidney R. Bluming | | | Confidential attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek | WP |
| LCI PRIV 00831 | 1/2005 | Sidney R. Bluming | | | Confidential attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek | WP |

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| LCI PRIV 00834 | 1/12/05 | Sidney R. Bluming | | | Confidential attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek | WP |
| LCI PRIV 00835 – LCI PRIV 00836 | 1/19/05 | Sidney R. Bluming | Christopher W. Madel | Dawn Van Alstine Greg LeMond | Confidential e-mail communication between attorneys with copy to client for the purpose of rendering legal advice regarding negotiations with Trek | AC/WP |
| LCI PRIV 00837 – LCI PRIV 00838 | 1/25/05 | Sidney R. Bluming | | | Confidential attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek | WP |
| LCI PRIV 00839 – LCI PRIV 00840 | 1/14/05 | Sidney R. Bluming | | | Draft correspondence to Trek containing confidential attorney notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek | WP |
| LCI PRIV 00841 – LCI PRIV 00842 | 1/14/05 | Sidney R. Bluming | | | Draft correspondence to Trek reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek | WP |
| LCI PRIV 00843 – LCI PRIV 00844 | 1/14/05 | Sidney R. Bluming | | | Draft correspondence to Trek reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek | WP |
| LCI PRIV 00845 | 1/20/05 | Sidney R. Bluming | | | Confidential attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek | WP |
| LCI PRIV 00847 – LCI PRIV 00849 | 1/12/05 | Sidney R. Bluming | Greg LeMond Kathy LeMond Christopher W. Madel | | Confidential fax communication from attorney to client for the purpose of rendering legal advice regarding negotiations with Trek | AC/WP |
| LCI PRIV 00850 | 1/13/05 | Sidney R. Bluming | | | Confidential attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek | WP |
| LCI PRIV 00851 – LCI PRIV 00858 | 12/16/04 | Sidney R. Bluming | | | Confidential attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek | WP |

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| LCI PRIV 00861 – LCI PRIV 00862 | 12/2/04 | Sidney R. Bluming | | | Confidential attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek | WP |
| LCI PRIV 00865 – LCI PRIV 00866 | 12/9/04 | Christopher W. Madel | Sidney R. Bluming Greg LeMond | Dawn Van Alstine | Confidential e-mail communication between attorneys with copy to client for the purpose of rendering legal advice regarding litigation strategy | AC/WP |
| LCI PRIV 00867 | 12/2/04 | Sidney R. Bluming | | | Confidential attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek | WP |
| LCI PRIV 00869 | 9/3/04 | Sidney R. Bluming | Greg LeMond | Martin R. Lueck | Confidential e-mail communication from attorney to client for the purpose of rendering legal advice regarding negotiations with Trek | AC/WP |
| LCI PRIV 00870 – LCI PRIV 00871 | 9/2/04 | Sidney R. Bluming | Greg LeMond | | Confidential memorandum from attorney to client reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding in anticipation of negotiations with Trek | WP |
| LCI PRIV 00872 – LCI PRIV 00873 | 9/9/04 | Mary Haigh | Sidney R. Bluming | | Confidential letter communication from client's representative to attorney for the purpose of obtaining legal advice regarding royalties | AC/WP |
| LCI PRIV 00874 – LCI PRIV 00889 | 12/6/04 | Sidney R. Bluming | | | Confidential draft litigation strategy reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice | WP |
| LCI PRIV 00890 | 11/16/02 | Mary Haigh | Sidney R. Bluming | | Confidential fax communication from client's representative to attorney for the purpose of obtaining legal advice regarding Litscher v. Trek, LeMond et al. suit | AC/WP |
| LCI PRIV 00891 | 12/12/07 | Bernie Boglioli | Greg LeMond | | Confidential e-mail communication between client and client's agent regarding investigation into inventory levels done in anticipation of litigation | WP |
| LCI PRIV 00891 – LCI PRIV 00892 | 12/12/07 | Greg LeMond | Bernie Boglioli | | Confidential e-mail communication between client and client's agent regarding investigation into inventory levels done in anticipation of litigation and at the request of attorneys. | WP |
| LCI PRIV 00893 | | | | | PRODUCED AT LCI 12156 | WP |
| LCI PRIV 00894 – LCI PRIV 00895 | 09/12/08 | Greg LeMond | Greg LeMond | | Confidential e-mail communication of client investigation at the direction of attorney to identify potential witnesses | WP |

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| LCI PRIV 00896 | 09/29/08 | Seth Wolins | Greg LeMond | | Confidential e-mail communication between client and potential witness, regarding investigation of Trek prepared and obtained to assist with litigation and done at the direction of attorneys. | WP |
| LCI PRIV 00896 - LCI PRIV 00897 | 09/29/08 | Andrew Carlson | Seth Wolins | | Confidential e-mail communication between person acting on behalf of client and potential witness, regarding investigation of Trek prepared and obtained to assist with litigation and done at the direction of attorneys. | WP |
| LCI PRIV 00898 | 09/19/08 | Joe Renock | Greg and Kathryn LeMond | Amy Goldsmith Marisol Lopez- DaRosso | Confidential e-mail communication between attorney's agent and client with copy to attorney and paralegal regarding legal advice about Trademark registration. | AC/WP |
| LCI PRIV 00899 | 09/19/08 | Joe Renock | Greg and Kathryn LeMond | Amy Goldsmith Marisol Lopez- DaRosso | Confidential e-mail communication between attorney's agent and client with copy to attorney and paralegal regarding legal advice about Trademark registration. | AC/WP |
| LCI PRIV 00900 | 09/22/08 | Joe Renock | Greg and Kathryn LeMond | Amy Goldsmith Marisol Lopez- DaRosso | Confidential e-mail communication between attorney's agent and client regarding legal advice about Trademark registration. | AC/WP |
| LCI PRIV 00900 - LCI PRIV 00901 | 09/19/08 | Joe Renock | Greg and Kathryn LeMond | Amy Goldsmith Marisol Lopez- DaRosso | Confidential e-mail communication between attorney's agent and client regarding legal advice about Trademark registration. | AC/WP |
| LCI PRIV 00902 | 09/23/08 | Bernie Boglioli | Kathryn LeMond | | Confidential e-mail communication between client's agent and client regarding legal advice about Trademark registration. | AC/WP |
| LCI PRIV 00902 | 09/22/08 | Joe Renock | Greg and Kathryn LeMond | | Confidential e-mail communication between attorney's agent and client regarding legal advice about Trademark registration. | AC/WP |
| LCI PRIV 00902 - LCI PRIV 00903 | 09/19/08 | Joe Renock | Greg and Kathryn LeMond | Amy Goldsmith Marisol Lopez- DaRosso | Confidential e-mail communication between attorney's agent and client regarding legal advice about Trademark registration. | AC/WP |
| LCI PRIV 00904 - LCI PRIV 00905 | 09/23/08 | Joe Renock (via teas@uspto.gov) | Greg and Kathryn LeMond | Joe Reenock | Confidential e-mail communication between attorney's agent and client with copy to attorney's agent regarding legal advice about Trademark registration. | AC/WP |
| LCI PRIV 00906 | 09/24/08 | Joe Renock | Greg and Kathryn LeMond | Amy Goldsmith Marisol Lopez- DaRosso | Confidential e-mail communication between attorney's agent and client with copy to attorney and paralegal regarding legal advice about Trademark registration. | AC/WP |

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| LCI PRIV 00906 | 09/24/08 | Greg LeMond | Joe Renock | | Confidential e-mail communication between client and attorney's agent regarding legal advice about Trademark registration. | AC/WP |
| LCI PRIV 00907 | 09/19/08 | Joe Renock | Greg and Kathryn LeMond | Amy Goldsmith Marisol Lopez-DaRosso | Confidential e-mail communication between attorney's agent and client with copy to attorney and paralegal regarding legal advice about Trademark registration. | AC/WP |
| LCI PRIV 00908 | 09/24/08 | Bernie Boglioli | Greg LeMond | | Confidential e-mail communication between client's agent and client regarding legal advice about Trademark registration. | AC/WP |
| LCI PRIV 00908 | 09/23/08 | George Rondeau Jr. | Bernie Boglioli | | Confidential e-mail communication between attorney's agent and client regarding legal advice about Trademark registration. | AC/WP |
| LCI PRIV 00908 | 09/22/08 | Bernie Boglioli | George Rondeau Jr | | Confidential e-mail communication between attorney's agent and client regarding legal advice about Trademark registration. | AC/WP |
| LCI PRIV 00908 - LCI PRIV 00909 | 09/22/08 | Kathryn LeMond | Bernie Boglioli | | Confidential e-mail communication between attorney's agent and client regarding legal advice about Trademark registration. | AC/WP |
| LCI PRIV 00909 | 09/22/08 | Joe Renock | Greg and Kathryn LeMond | | Confidential e-mail communication between attorney's agent and client regarding legal advice about Trademark registration. | AC/WP |
| LCI PRIV 00909 - LCI PRIV 00910 | 09/19/08 | Joe Renock | Greg and Kathryn LeMond | Amy Goldsmith Marisol Lopez-DaRosso | Confidential e-mail communication between attorney's agent and client with copy to attorney and paralegal regarding legal advice about Trademark registration. | AC/WP |
| LCI PRIV 00911 - LCI PRIV 00911a | 08/27/08 | Sidney Bluming | Greg LeMond | Denise Rahne | Confidential e-mail communication between attorney and client with copy to attorney regarding legal advice about Trademark assignments and attaching copy of confidential communication regarding same. | AC/WP |
| LCI PRIV 00911 - LCI PRIV 00911a | 08/27/08 | Sidney Bluming | Amy Goldsmith | Greg LeMond Denise Rahne | Confidential e-mail communication between attorneys with copy to client regarding legal advice about Trademark assignments and attaching copy of confidential communication regarding same. | AC/WP |
| LCI PRIV 00912 - LCI PRIV 00913f | 07/28/08 | Sidney Bluming | Chris Madel | Greg LeMond Denise Rahne | Confidential e-mail communication between attorneys with copy to client and attorney regarding communication with Trek about Trademark assignments. | AC/WP |
| LCI PRIV 00914 - LCI PRIV 00915i | | | | | PRODUCED at LCI 12143-53 | |

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| LCI PRIV 00916 | 07/23/08 | Sidney Bluming | Chris Madel | Greg LeMond Denise Rahne | Confidential e-mail communication between attorneys with copy to client and attorney regarding legal advice about Trademark assignments. | AC/WP |
| LCI PRIV 00917 | 06/19/08 | Marisol Lopez-DaRosso | Greg LeMond | Amy Goldsmith | Confidential e-mail communication between paralegal and client with copy to attorney regarding legal advice about Trademark application. | AC/WP |
| LCI PRIV 00917 – LCI PRIV 00918 | 05/23/08 | Joe Reenock | Greg LeMond Kathryn LeMond | Amy Goldsmith Marisol Lopez-DaRosso | Confidential e-mail communication between attorney's agent and client with copy to attorney and paralegal regarding legal advice about Trademark application. | AC/WP |
| LCI PRIV 00918 | 05/23/08 | Greg LeMond | Joe Reenock | | Confidential e-mail communication between attorney's agent and client regarding legal advice about Trademark application. | AC/WP |
| LCI PRIV 00919- 00920 | | Kathy LeMond | | | PRODUCED AT LCI 12157-12158 | AC/WP |
| LCI PRIV 00921 – LCI PRIV 00922 | | | | | PRODUCED AT LCI 12195-12196 | |
| LCI PRIV 00923 – LCI PRIV 00924 | | | | | PRODUCED AT LCI 12197-12198 | |
| LCI PRIV 00925 – LCI PRIV 00926 | | | | | PRODUCED AT LCI 12199-12200 | |
| LCI PRIV 00927 – LCI PRIV 00928 | | | | | PRODUCED AT LCI 12201-12202 | |
| LCI PRIV 00929 – LCI PRIV 00930 | | | | | PRODUCED AT LCI 12203-12204 | 04/09/08 |
| LCI PRIV 00931 – LCI PRIV 00932 | | | | | PRODUCED AT LCI 12205-12206 | |
| LCI PRIV 00933 – LCI PRIV 00934 | | | | | PRODUCED AT LCI 12207-12208 | |
| LCI PRIV 00935 – LCI PRIV 00936 | | | | | PRODUCED AT LCI 12209-12210 | |
| LCI PRIV 00937 – LCI PRIV 00938 | | | | | PRODUCED AT 12211-12212 | |

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| LCI PRIV 00939 | 08/15/08 | Denise Rahne | Kathryn LeMond | | Confidential e-mail communication between attorney and client for the purpose of rendering legal advice regarding litigation strategy. | AC/WP |
| LCI PRIV 00939 | 08/15/08 | Kathryn LeMond | Denise Rahne | | Confidential e-mail communication between attorney and client for the purpose of rendering legal advice regarding litigation strategy. | AC/WP |
| LCI PRIV 00939 – LCI PRIV 00940 | 08/15/08 | Kerry Roberts | Greg LeMond | | Confidential e-mail communication between client and potential witness, regarding investigation of Trek prepared and obtained to assist with litigation and done at the direction of attorneys. | WP |
| LCI PRIV 00941 | 04/25/08 | Kathryn LeMond | Denise Rahne | Greg and Kathryn LeMond | Confidential e-mail communication from client to attorney for the purpose of obtaining legal advice regarding litigation strategy. | AC/WP |
| LCI PRIV 00942 – LCI PRIV 00942b | 08/03/08 | Greg LeMond | Kathryn LeMond | | Confidential e-mail communication between clients prepared for the purpose of obtaining legal advice regarding communication with Trek and prepared at the request of counsel. | WP |
| LCI PRIV 00943 | 07/16/08 | Sidney Bluming | Greg LeMond | Chris Madel | PRODUCED at LCI 12142. | |
| LCI PRIV 00944 | 07/16/08 | Sidney Bluming | Greg LeMond | Chris Madel | Confidential e-mail communication from attorney to client with copy to attorney for the purpose of rendering legal advice regarding communication with Trek about litigation strategy. | AC/WP |
| LCI PRIV 00945 – LCI PRIV 00946 | 11/12/07 | Greg LeMond | Greg LeMond | | Confidential e-mail communication of client investigation at the direction of counsel to assess legal claims. | WP |
| LCI PRIV 00947 | 03/25/08 | Sidney Bluming | Greg LeMond | Chris Madel Denise Rahne | Confidential e-mail communication from attorney to client with copy to attorneys for the purpose of rendering legal advice regarding litigation strategy. | AC/WP |
| LCI PRIV 00948 | 03/31/08 | Sidney Bluming | Chris Madel | Denise Rahne Dawn Van Alstine Greg LeMond | Confidential e-mail communication between attorneys with copy to client, attorney, and legal administrative assistant for the purpose of rendering legal advice regarding litigation strategy. | AC/WP |
| LCI PRIV 00948 – LCI PRIV 00949 | 03/28/08 | Chris Madel | Sidney Bluming | Denise Rahne Dawn Van Alstine | Confidential e-mail communication between attorneys with copy to attorney and legal administrative assistant for the purpose of rendering legal advice regarding litigation strategy. | AC/WP |

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| LCI PRIV 00949 – LCI PRIV 00950 | 03/28/08 | Sidney Bluming | Greg LeMond | Chris Madel Denise Rahne | Confidential e-mail communication between attorney and client with copy to attorneys for the purpose of rendering legal advice regarding litigation strategy. | AC/WP |
| LCI PRIV 00951 – LCI PRIV 00951d | 04/04/08 | Amy Goldsmith | Greg LeMond | Joe Reenock | Confidential e-mail communication from attorney to client with copy to attorney's agent regarding legal advice about Trademark registration. | AC/WP |
| LCI PRIV 00952 | 04/08/08 | Sidney Bluming | Denise Rahne | Dawn Van Alistine Greg LeMond | Confidential e-mail communication between attorneys with copy to client and legal administrative assistant regarding litigation strategy. | AC/WP |
| LCI PRIV 00952 – LCI PRIV 00953 | 04/08/08 | Denise Rahne | Sidney Bluming | Dawn Van Alistine | Confidential e-mail communication between attorneys with copy to legal administrative assistant regarding litigation strategy. | AC/WP |
| LCI PRIV 00954 | 04/08/08 | Sidney Bluming | Greg LeMond | Denise Rahne Chris Madel | Confidential e-mail communication from attorney to client with copies to attorneys for the purpose of rendering legal advice regarding litigation strategy. | AC/WP |
| LCI PRIV 00955 – LCI PRIV 00955a | | | | | PRODUCED AT LCI 12213-14 | |
| LCI PRIV 00956- 60 | | | | | PRODUCED AT LCI 12215-18 | |
| LCI PRIV 00961- 64 | | | | | PRODUCED AT LCI 12220-22 | |
| LCI PRIV 00965- 67 | | | | | PRODUCED AT LCI 12224-26 | |
| LCI PRIV 00968 – LCI PRIV 00968b | 05/13/08 | Sidney Bluming | Chris Madel Denise Rahne | Greg LeMond | Confidential e-mail communication between attorneys with copy to client for the purpose of rendering legal advice regarding communication with Trek, and attaching draft correspondence for the purpose of discussing litigation strategy. | AC/WP |
| LCI PRIV 00968a – LCI PRIV 00968b | 05/13/08 | Sidney Bluming | Joseph Sieffkes | Greg LeMond Robert Burns | Confidential draft correspondence for the purpose of discussing litigation strategy attached to confidential email communication between attorneys reflecting attorneys' thoughts, mental impressions, legal opinions and legal advice. | WP |

| Bates number | Date | Author | To | Copied | Privileged/Description | Reason |
|----------------------------------|----------|----------------|-------------------------------|--|--|--------|
| LCI PRIV 00969-00971a | | | | | PRODUCED AT LCI 12159 - 12162 | |
| LCI PRIV 00972 | 05/14/08 | Sidney Bluming | Denise Rahne | Greg LeMond Dawn Van Alstine Chris Madel | Confidential e-mail communication between attorneys with copy to client, attorney, and legal administrative assistant for the purpose of rendering legal advice regarding litigation strategy. | AC/WP |
| LCI PRIV 00972 – LCI PRIV 00973 | 05/14/08 | Denise Rahne | Sidney Bluming | Greg LeMond Dawn Van Alstine Chris Madel | Confidential e-mail communication between attorneys with copy to client, attorney, and legal administrative assistant for the purpose of rendering legal advice regarding litigation strategy. | AC/WP |
| LCI PRIV 00973 | 05/13/08 | Sidney Bluming | Denise Rahne | Greg LeMond Dawn Van Alstine Chris Madel | Confidential e-mail communication between attorneys with copy to client, attorney, and legal administrative assistant for the purpose of rendering legal advice regarding litigation strategy. | AC/WP |
| LCI PRIV 00973 | 05/13/08 | Denise Rahne | Sidney Bluming Chris Madel | Greg LeMond Dawn Van Alstine | Confidential e-mail communication between attorneys with copy to client, attorney, and legal administrative assistant for the purpose of rendering legal advice regarding litigation strategy. | AC/WP |
| LCI PRIV 00974 – LCI PRIV 00975 | 05/13/08 | Sidney Bluming | Denise Rahne | Greg LeMond Dawn Van Alstine Chris Madel | Confidential e-mail communication between attorneys with copy to client, attorney, and legal administrative assistant for the purpose of rendering legal advice regarding litigation strategy. | AC/WP |
| LCI PRIV 00976 – LCI PRIV 00976b | 05/19/08 | Sidney Bluming | Denise Rahne | Greg LeMond Chris Madel | PRODUCED AT LCI 12139-41 | |
| LCI PRIV 00977 – LCI PRIV 00977c | 05/19/08 | Sidney Bluming | Denise Rahne | Greg LeMond Chris Madel | Confidential e-mail communication between attorneys with copy to client, attorney for the purpose of rendering legal advice regarding communication with Trek regarding royalties. | AC/WP |
| LCI PRIV 00978-00979 | | | | | PRODUCED AT LCI 12163-12164 | |
| LCI PRIV 00980 | 05/19/08 | Sidney Bluming | Denise Rahne | Greg LeMond | Confidential e-mail communication between attorneys with copy to client for the purpose of rendering legal advice regarding litigation strategy. | AC/WP |
| LCI PRIV 00981 – LCI PRIV 00982 | 05/20/08 | Sidney Bluming | Denise Rahne | Greg LeMond Chris Madel | Confidential e-mail communication between attorneys with copy to client and attorney for the purpose of rendering legal advice regarding litigation strategy. | AC/WP |

| Bates number | Date | Author | To | Copied | Privilege Description | Reason |
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| LCI PRIV 00983 | 05/22/08 | Joe Reenock | Greg and Kathryn LeMond | Sidney Bluming Amy Goldsmith Marisol Lopez-DaRosso | Confidential e-mail communication between attorney's agent and client with copy to attorneys and paralegal for the purpose of providing legal advice regarding Trademark registration. | AC/WP |
| LCI PRIV 00983 – LCI PRIV 00985 | 11/29/07 | Amy Goldsmith | Greg LeMond | Joe Reenock | Confidential e-mail communication between attorney and client with copy to attorney's agent for the purpose of providing legal advice regarding Trademark registration. | AC/WP |
| LCI PRIV 00986 | 05/23/08 | Joe Reenock | Greg and Kathryn LeMond | Amy Goldsmith Marisol Lopez-DaRosso | Confidential e-mail communication between attorney's agent and client with copy to attorney and paralegal for the purpose of providing legal advice regarding Trademark registration. | AC/WP |
| LCI PRIV 00986 | 05/22/08 | Kathy LeMond | Joe Reenock | | Confidential e-mail communication between attorney's agent and client for the purpose of obtaining legal advice regarding Trademark registration. | AC/WP |
| LCI PRIV 00986 – LCI PRIV 00987 | 05/22/08 | Joe Reenock | Greg and Kathryn LeMond | Amy Goldsmith Marisol Lopez-DaRosso | Confidential e-mail communication between attorney's agent and client with copy to attorney and paralegal for the purpose of providing legal advice regarding Trademark registration. | AC/WP |
| LCI PRIV 00987 – LCI PRIV 00989 | 11/29/07 | Amy Goldsmith | Greg LeMond | Joe Reenock | Confidential e-mail communication between attorney' and client with copy to attorney's agent for the purpose of providing legal advice regarding Trademark registration. | AC/WP |
| LCI PRIV 00990 | 05/23/08 | Bernie Boglioli | Greg LeMond | | Confidential e-mail communication between client's agent and client reflecting legal advice regarding Trademark registration. | AC/WP |
| LCI PRIV 00990 – LCI PRIV 00991 | 05/23/08 | Greg LeMond | Bernie Boglioli | | Confidential e-mail communication between client's agent and client reflecting legal advice regarding Trademark registration. | AC/WP |
| LCI PRIV 00991 | 05/22/08 | Kathy LeMond | Joe Reenock | | Confidential e-mail communication between attorney's agent and client for the purpose of obtaining legal advice regarding Trademark registration. | AC/WP |
| LCI PRIV 00991 – LCI PRIV 00992 | 05/22/08 | Joe Reenock | Greg and Kathryn LeMond | Amy Goldsmith Marisol Lopez-DaRosso | Confidential e-mail communication between attorney's agent and client with copy to attorney and paralegal for the purpose of providing legal advice regarding Trademark registration. | AC/WP |

| Bates number | Date | Author | To | Copied | Privilege Description | Reason |
|-------------------------------------|----------|-----------------|-------------------------|--|---|--------|
| LCI PRIV 00992 – LCI PRIV 00994 | 11/29/07 | Amy Goldsmith | Greg LeMond | Joe Reenock | Confidential e-mail communication between attorney' and client with copy to attorney's agent for the purpose of providing legal advice regarding Trademark registration. | AC/WP |
| LCI PRIV 00995 | 05/23/08 | Joe Reenock | Greg and Kathryn LeMond | Amy Goldsmith Marisol Lopez- DaRosso | Confidential e-mail communication between attorney's agent and client with copy to attorney and paralegal for the purpose of providing legal advice about Trademark registration. | AC/WP |
| LCI PRIV 00995 – LCI PRIV 00996 | 05/23/08 | Greg LeMond | Joe Reenock | | Confidential e-mail communication between attorney's agent and client for the purpose of obtaining legal advice about Trademark registration. | AC/WP |
| LCI PRIV 00997 | 05/27/08 | Amy Goldsmith | Greg and Kathryn LeMond | Marisol Lopez- DaRosso | Confidential e-mail communication between attorney and client with copy to paralegal for the purpose of providing legal advice regarding Trademark registration. | AC/WP |
| LCI PRIV 00997 – LCI PRIV 00998 | 05/23/08 | Joe Reenock | Greg and Kathryn LeMond | Amy Goldsmith Marisol Lopez- DaRosso | Confidential e-mail communication between attorney's agent and client with copy to attorney and paralegal for the purpose of providing legal advice about Trademark registration. | AC/WP |
| LCI PRIV 00998 | 05/23/08 | Greg LeMond | Joe Reenock | | Confidential e-mail communication between attorney's agent and client for the purpose of obtaining legal advice about Trademark registration. | AC/WP |
| LCI PRIV 00999 – LCI PRIV 01000 | 05/27/08 | Ed Chanin | Kathryn LeMond | | Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding incorporation of Geoffrey LeMond's business. | AC/WP |
| LCI PRIV 00999 | 05/27/08 | Kathryn LeMond | Ed Chanin | | Confidential e-mail communication between attorney and client for the purpose of obtaining legal advice regarding incorporation of Geoffrey LeMond's business. | AC/WP |
| LCI PRIV 00999 – LCI PRIV 01000 | 05/24/08 | Geoffrey LeMond | Kathryn LeMond | | Confidential communication between client and son for the purpose of obtaining legal advice regarding incorporation of Geoffrey LeMond's business | AC/WP |
| LCI PRIV 01001 – LCI PRIV 01001e | 05/02/08 | Sidney Bluming | Denise Rahne | Greg LeMond | Confidential e-mail communication between attorneys with copy to client for the purpose of providing legal advice regarding litigation strategy. | AC/WP |

| Bates number | Date | Author | To | Copied | Privilege Description | Reason |
|-------------------------------------|----------|----------------|-----------------------------|--|---|--------|
| LCI PRIV 01002 – LCI PRIV 01003b | 05/13/08 | Sidney Bluming | Chris Madel Denise Rahne | Greg LeMond | Confidential e-mail communication between attorneys with copy to client for the purpose of providing legal advice regarding litigation strategy. | AC/WP |
| LCI PRIV 01004 | 05/30/08 | Sidney Bluming | Denise Rahne | Kathryn LeMond Greg LeMond Colleen Dominick Chris Madel | Confidential e-mail communication between attorneys with copy to client, attorney and legal administrative assistant for the purpose of communicating litigation strategy. | AC/WP |
| LCI PRIV 01004 – LCI PRIV 01005 | 05/30/08 | Denise Rahne | Greg and Kathy LeMond | Sidney Bluming Colleen Dominick Chris Madel | Confidential e-mail communication between attorney and client with copy to attorneys and legal administrative assistant for the purpose of communicating litigation strategy. | AC/WP |
| LCI PRIV 01006 | 01/17/08 | Sidney Bluming | Greg LeMond | Chris Madel | Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding a draft speaking agreement. | AC/WP |
| LCI PRIV 01006 – LCI PRIV 01007 | 01/17/08 | Greg LeMond | Sidney Bluming | Chris Madel | Confidential e-mail communication between attorney and client for the purpose of obtaining legal advice regarding a draft speaking agreement. | AC/WP |
| LCI PRIV 01008 | 03/25/08 | Sidney Bluming | John Post | Greg LeMond Bernie Boglioli | Confidential e-mail communication between attorney and client's agent with copy to client and client's agent for the purpose of rendering legal advice regarding trademarks. | AC/WP |
| LCI PRIV 01008 – LCI PRIV 01009 | 03/24/08 | John Post | Sidney Bluming | Greg LeMond Bernie Boglioli | Confidential e-mail communication between attorney and client's agent with copy to client and client's agent for the purpose of obtaining legal advice regarding trademarks. | AC/WP |
| LCI PRIV 01010 | 03/25/08 | John Post | Sidney Bluming | Bernie Boglioli Greg LeMond | Confidential e-mail communication between client's agent and attorney with copy to client and client's agent for the purpose of obtaining legal advice regarding trademarks. | AC/WP |
| LCI PRIV 01010 – LCI PRIV 01011 | 03/24/08 | Sidney Bluming | John Post | Greg LeMond Bernie Boglioli | Confidential e-mail communication between attorney and client's agent with copy to client and client's agent for the purpose of rendering legal advice regarding trademarks. | AC/WP |
| LCI PRIV 01010 – LCI PRIV 01011 | 03/25/08 | John Post | Sidney Bluming | Bernie Boglioli Greg LeMond | Confidential e-mail communication between client's agent and attorney with copy to client and client's agent for the purpose of obtaining legal advice regarding trademarks. | AC/WP |

| Bates number | Date | Author | To | Copied | Privileged Description | Reason |
|--------------------------------------|----------|----------------|----------------|--------------------------------|---|--------|
| LCI PRIV 01012 | 03/25/08 | Sidney Bluming | John Post | Bernie Boglioli Greg LeMond | Confidential e-mail communication between attorney and client's agent with copy to client and client's agent for the purpose of providing legal advice regarding trademarks. | AC/WP |
| LCI PRIV 01012 - LCI PRIV 01013 | 03/25/08 | John Post | Sidney Bluming | Bernie Boglioli Greg LeMond | Confidential e-mail communication between client's agent and attorney with copy to client and client's agent for the purpose of obtaining legal advice regarding trademarks. | AC/WP |
| LCI PRIV 01013 | 03/24/08 | Sidney Bluming | John Post | Greg LeMond Bernie Boglioli | Confidential e-mail communication between attorney and client's agents with copy to client and client's agent for the purpose of rendering legal advice regarding trademarks. | AC/WP |
| LCI PRIV 01013 - LCI PRIV 01014 | 03/25/08 | John Post | Sidney Bluming | Bernie Boglioli Greg LeMond | Confidential e-mail communication between client's agent and attorney with copy to client and client's agent for the purpose of obtaining legal advice regarding trademarks. | AC/WP |
| LCI PRIV 01015 - LCI PRIV 01015b | 01/14/08 | Anne Cushing | Greg LeMond | | Confidential e-mail communication between client's agent and client regarding legal advice and draft speaking agreement. | WP |
| LCI PRIV 01015 - LCI PRIV 01015b | 01/03/08 | Greg LeMond | Anne Cushing | | Confidential e-mail communication between client's agent and client regarding legal advice and draft speaking agreement. | WP |
| LCI PRIV 01015a - LCI PRIV 01015b | 01/03/08 | Steve Leins | | | Confidential draft speaking agreement reflecting attorneys' thoughts, mental impressions attached to e-mail communication between client's agent and client for the purpose of obtaining legal advice regarding draft speaking agreement. | WP |
| LCI PRIV 01016 - LCI PRIV 01017 | 01/21/08 | Sidney Bluming | Greg LeMond | Chris Madel Bruce Manning | Confidential e-mail communication between attorney and client with copy to attorneys for the purpose of providing legal advice regarding communications with Trek about sales and marketing of the LeMond brand. | AC/WP |
| LCI PRIV 01018 | 01/23/08 | Sidney Bluming | Anne Cushing | Greg LeMond Cassandra Ching | Confidential e-mail communication between attorney and client's agent with copy to client and attorney for the purpose of providing legal advice regarding attached draft speaking agreement. | AC/WP |
| LCI PRIV 01018 - LCI PRIV 01019 | 01/22/08 | Anne Cushing | Sidney Bluming | | Confidential e-mail communication between attorney and client's agent for the purpose of providing legal advice regarding attached draft speaking agreement. | AC/WP |

| Bates number | Date | Author | To | Copied | Privilege Description | Reason |
|--------------------------------------|----------|-----------------|----------------|---|---|--------|
| LCI PRIV 01019a - LCI PRIV 01019h | 1/2008 | Sidney Bluming | | | Confidential draft speaking agreement reflecting attorney's thoughts, mental impressions, legal opinions and legal advice attached to e-mail communication between attorney and client's agent for the purpose of providing legal advice. | WP |
| LCI PRIV 01020 | 01/23/08 | Sidney Bluming | Anne Cushing | Greg LeMond Cassandra Ching | Confidential e-mail communication between attorney and client's agent with copy to client and attorney for the purpose of providing legal advice regarding draft speaking agreement. | AC/WP |
| LCI PRIV 01020 - LCI PRIV 01021 | 01/23/08 | Cassandra Ching | Sidney Bluming | | Confidential e-mail communication between attorneys for the purpose of providing legal advice regarding attached draft speaking agreement. | AC/WP |
| LCI PRIV 01021 | 01/23/08 | Sidney Bluming | Anne Cushing | Cassandra Ching | Confidential e-mail communication between attorney and client's agent with copy attorney for the purpose of providing legal advice regarding attached draft speaking agreement. | AC/WP |
| LCI PRIV 01021 - LCI PRIV 01022 | 01/23/08 | Anne Cushing | Sidney Bluming | | Confidential e-mail communication between attorney and client's agent for the purpose of obtaining legal advice regarding attached draft speaking agreement. | AC/WP |
| LCI PRIV 01022 - LCI PRIV 01023h | 01/22/08 | Anne Cushing | Sidney Bluming | | Confidential e-mail communication between attorney and client's agent for the purpose of obtaining legal advice regarding attached draft speaking agreement. | AC/WP |
| LCI PRIV 01023a - LCI PRIV 01023h | 1/2008 | Sidney Bluming | | | Confidential draft speaking agreement reflecting attorney's thoughts, mental impressions, legal opinions and legal advice attached to e-mail communication between attorney and client's agent for the purpose of providing legal advice | WP |
| LCI PRIV 01024 - 01027 | | | | | PRODUCED AT LCI 12165-12177 | |
| LCI PRIV 01028 - LCI PRIV 01029x | 02/06/08 | Sidney Bluming | Denise Rahne | Dawn Van Alstine Colleen Dominick Greg LeMond | Confidential e-mail communication between attorneys with copy to client and legal administrative assistants for the purpose of communicating litigation strategy. | AC/WP |
| LCI PRIV 01028 - LCI PRIV 01029x | 02/06/08 | Denise Rahne | Sidney Bluming | Dawn Van Alstine Colleen Dominick Greg LeMond | Confidential e-mail communication between attorneys with copy to client and legal administrative assistants for the purpose of communicating litigation strategy. | AC/WP |

| Bates number | Date | Author | To | Copied | Privilege Description | Reason |
|--------------------------------------|----------|----------------|--|---|---|--------|
| LCI PRIV 01029 - LCI PRIV 01029x | 2/06/08 | Denise Rahne | | | Confidential draft communication reflecting attorney's thoughts, mental impressions, legal opinions and legal advice attached to e-mail communication between attorneys with copy to client and legal administrative assistants for the purpose of communicating litigation strategy. | AC/WP |
| LCI PRIV 01030- 1031 | | | | | PRODUCED AT LCI 12178-12186 | |
| LCI PRIV 01032 - LCI PRIV 01032w | 02/07/08 | Greg LeMond | Greg LeMond | | Confidential e-mail communication reflecting legal advice for the purpose of assessing litigation strategy at the direction of attorneys. | AC/WP |
| LCI PRIV 01033 | 02/07/08 | Sidney Bluming | Denise Rahne | Chris Madel Bruce Manning Dawn Van Alstine Greg LeMond | Confidential e-mail communication between attorneys with copy to client, attorneys, and legal administrative assistant for the purpose of communicating litigation strategy. | AC/WP |
| LCI PRIV 01033 - LCI PRIV 01034 | 02/07/08 | Denise Rahne | Chris Madel Bruce Manning Sidney Bluming | Dawn Van Alstine Greg LeMond | Confidential e-mail communication between attorneys with copy to client and legal administrative assistant for the purpose of communicating litigation strategy. | AC/WP |
| LCI PRIV 01035 - LCI PRIV 01036b | 02/07/08 | Sidney Bluming | Denise Rahne Chris Madel Bruce Manning | Dawn Van Alstine Greg LeMond | Confidential e-mail communication between attorneys with copy to client and legal administrative assistant for the purpose of providing legal advice regarding litigation strategy. | AC/WP |
| LCI PRIV 01037 - LCI PRIV 01037uu | 02/12/08 | Greg LeMond | Denise Rahne | Greg LeMond | Confidential e-mail communication between client and attorney with copy to client for the purposes of receiving legal advice on litigation strategy. | AC/WP |
| LCI PRIV 01038 - LCI PRIV 01038b | 01/16/08 | Sidney Bluming | Chris Madel | Greg LeMond Bruce Manning | Confidential e-mail communication between attorneys with copy to client and attorney for the purpose of providing legal advice regarding litigation strategy. | AC/WP |
| LCI PRIV 01039 | 01/16/08 | Sidney Bluming | Greg LeMond | Chris Madel Bruce Manning | Confidential e-mail communication between attorney and client with copy to attorneys for the purpose of providing legal advice regarding litigation strategy. | AC/WP |

| Bates number | Date | Author | To | Copied | Privilege Description | Reason |
|--------------------------------------|----------|----------------|-------------------------------|--|--|--------|
| LCI PRIV 01040 | 01/16/08 | Sidney Bluming | Bruce Manning | Greg LeMond Chris Madel Denise Rahne Dawn Van Alstine | Confidential e-mail communication between attorneys with copy to client, attorney, and legal administrative assistant for the purpose of providing legal advice regarding litigation strategy. | AC/WP |
| LCI PRIV 01040 - LCI PRIV 01041 | 01/16/08 | Bruce Manning | Sidney Bluming Chris Madel | Greg LeMond Denise Rahne Dawn Van Alstine | Confidential e-mail communication between attorneys with copy to client, attorney, and legal administrative assistant for the purpose of providing legal advice regarding litigation strategy. | AC/WP |
| LCI PRIV 01041 - LCI PRIV 01042 | 01/16/08 | Sidney Bluming | Chris Madel | Greg LeMond Bruce Manning | Confidential e-mail communication between attorneys with copy to client and attorneys for the purpose of providing legal advice regarding litigation strategy. | AC/WP |
| LCI PRIV 01043- 01044 | | | | | PRODUCED AT LCI 12187-12188 | |
| LCI PRIV 01045 - LCI PRIV 01045ff | 02/20/08 | Denise Rahne | Greg LeMond | Colleen Dominick Dawn Van Alstine | Confidential e-mail communication between attorney and client with copy to legal administrative assistants for the purpose of providing legal advice regarding litigation strategy. | AC/WP |
| LCI PRIV 01046 | 02/22/08 | Sidney Bluming | Anne Cushing | Greg LeMond Cassandra Ching | Confidential e-mail communication between attorney and client's agent with copy to client and attorney for the purpose of providing legal advice regarding draft speaking agreement. | AC/WP |
| LCI PRIV 01046 - LCI PRIV 01047 | 02/22/08 | Anne Cushing | Sidney Bluming | | Confidential e-mail communication between attorney and client's agent for the purpose of obtaining legal advice regarding draft speaking agreement. | AC/WP |
| LCI PRIV 01047 | 01/23/08 | Sidney Bluming | Anne Cushing | Cassandra Ching | Confidential e-mail communication between attorney and client's agent with copy attorney for the purpose of providing legal advice regarding draft speaking agreement. | AC/WP |
| LCI PRIV 01047 - LCI PRIV 01048 | 01/23/08 | Anne Cushing | Sidney Bluming | | Confidential e-mail communication between attorney and client's agent for the purpose of obtaining legal advice regarding draft speaking agreement. | AC/WP |
| LCI PRIV 01048 | 01/23/08 | Sidney Bluming | Anne Cushing | Greg LeMond Cassandra Ching | Confidential e-mail communication between attorney and client's agent with copy to client and attorney for the purpose of providing legal advice regarding draft speaking agreement. | AC/WP |

| Bates number | Date | Author | To | Copied | Privileged Description | Reason |
|------------------------------------|----------|----------------|----------------|-----------------------------|--|--------|
| LCI PRIV 01047 - LCI PRIV 01048 | 01/22/08 | Anne Cushing | Sidney Bluming | | Confidential e-mail communication between attorney and client's agent for the purpose of obtaining legal advice regarding draft speaking agreement. | AC/WP |
| LCI PRIV 01050- 01051 | | | | | PRODUCED AT LCI 12189-12190 | |
| LCI PRIV 01052- 01053 | | | | | PRODUCED AT LCI 12191-12192 | |
| LCI PRIV 01054 | 03/03/08 | Sidney Bluming | Chris Madel | Denise Rahne Greg LeMond | Confidential e-mail communication between attorneys with copy to client and attorney for the purpose of providing legal advice regarding litigation strategy. | AC/WP |
| LCI PRIV 01055 | 03/20/08 | Sidney Bluming | Denise Rahne | Greg LeMond | Confidential e-mail communication between attorneys with copy to client for the purpose of providing legal advice regarding litigation strategy. | AC/WP |
| LCI PRIV 01056- 01057 | | | | | PRODUCED AT LCI 12193-12194 | |
| LCI PRIV 01058 | 01/11/08 | Sidney Bluming | Greg LeMond | Chris Madel | Confidential e-mail communication between attorney and client with copy to attorney for the purpose of providing legal advice regarding litigation strategy. | AC/WP |
| LCI PRIV 01059 | 01/03/08 | Sidney Bluming | Greg LeMond | | Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding litigation strategy. | AC/WP |
| LCI PRIV 01060 | 10/14/07 | Sidney Bluming | Greg LeMond | Cassandra Ching | Confidential e-mail communication between attorney and client with copy to attorney for the purpose of providing legal advice regarding draft speaking engagement. | AC/WP |
| LCI PRIV 01061 | 10/05/07 | Sidney Bluming | Greg LeMond | | Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding Agreement with Trek and proposed speaking agreements | AC/WP |
| LCI PRIV 01061 - LCI PRIV 01062 | 10/05/07 | Greg LeMond | Sidney Bluming | | Confidential e-mail communication between attorney and client for the purpose of obtaining legal advice regarding Agreement with Trek and proposed speaking agreements | AC/WP |

| Bates number | Date | Author | To | Copied | Privilege Description | Reason |
|------------------------------------|----------|-----------------------|--------------------------------------|------------------------------|---|--------|
| LCI PRIV 01063 | 11/29/07 | Sidney Bluming | Greg LeMond | Chris Madel | Confidential e-mail communication between attorney and client with copy to attorney for the purpose of providing legal advice regarding litigation strategy. | AC/WP |
| LCI PRIV 01064 | 06/21/07 | Marisol Lopez-DaRosso | Greg LeMond Marisol Lopez-DaRosso | Sid Bluming Amy Goldsmith | Confidential e-mail communication between paralegal and client with copy to attorney's for the purpose of providing legal advice regarding trademarks. | AC/WP |
| LCI PRIV 01064 | 03/28/07 | Marisol Lopez-DaRosso | Greg LeMond | Sid Bluming Amy Goldsmith | Confidential e-mail communication between paralegal and client with copy to attorney's for the purpose of providing legal advice regarding trademarks. | AC/WP |
| LCI PRIV 01064 - LCI PRIV 01065 | 12/19/06 | Amy Goldsmith | Greg LeMond | Marisol Lopez-DaRosso | Confidential e-mail communication between attorney and client with copy to paralegal for the purpose of providing legal advice regarding trademarks. | AC/WP |
| LCI PRIV 01065 | 10/25/06 | Amy Goldsmith | Greg LeMond | Marisol Lopez-DaRosso | Confidential e-mail communication between attorney and client with copy to paralegal for the purpose of providing legal advice regarding trademarks. | AC/WP |
| LCI PRIV 01066 - LCI PRIV 01068 | 11/29/07 | Amy Goldsmith | Greg LeMond | Joe Reenock | Confidential e-mail communication between attorney and client with copy to attorney's agent for the purpose of providing legal advice regarding trademark registration. | AC/WP |
| LCI PRIV 01069 - LCI PRIV 01071 | 11/29/07 | Amy Goldsmith | Greg LeMond | Joe Reenock | Confidential e-mail communication between attorney and client with copy to attorney's agent for the purpose of providing legal advice regarding trademark registration. | AC/WP |
| LCI PRIV 01072 | 11/29/07 | Sidney Bluming | Greg LeMond | | Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding litigation strategy. | AC/WP |
| LCI PRIV 01073 | 12/03/07 | Amy Goldsmith | Greg LeMond | Joe Reenock | Confidential e-mail communication between attorney and client with copy to attorney's agent for the purpose of providing legal advice regarding trademarks. | AC/WP |
| LCI PRIV 01074 | 12/04/17 | Sidney Bluming | Chris Madel | Greg LeMond | Confidential e-mail communication between attorneys with copy to client for the purposes of legal advice regarding litigation strategy. | AC/WP |

| Bates number | Date | Author | To | Copied | Privileged | Description | Reason |
|--------------------------------------|----------|----------------|----------------|------------------------------------|--|-------------|--------|
| LCI PRIV 01075 - LCI PRIV 01075b | 11/02/07 | Amy Goldsmith | Greg LeMond | Sidney Bluming Althea Armstrong | Confidential e-mail communication between attorney and client with copy to attorney and attorney's agent for the purpose of providing legal advice regarding trademarks. | | AC/WP |
| LCI PRIV 01076 - LCI PRIV 01077h | 08/20/07 | Sidney Bluming | Greg LeMond | | Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding draft speaking engagement and litigation strategy. | | AC/WP |
| LCI PRIV 01076 - LCI PRIV 01077 | 08/19/07 | Greg LeMond | Sidney Bluming | | Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding draft speaking engagement and litigation strategy. | | AC/WP |
| LCI PRIV 01077a - LCI PRIV 01077 | 8/2007 | Sidney Bluming | | | Confidential draft speaking agreement reflecting attorney's thoughts, mental impressions, legal opinions and legal advice attached to e-mail communication between attorney and client's agent for the purpose of providing legal advice | | WP |
| LCI PRIV 01077e - LCI PRIV 01077h | 8/2007 | Sidney Bluming | | | Confidential draft speaking agreement reflecting attorney's thoughts, mental impressions, legal opinions and legal advice attached to e-mail communication between attorney and client's agent for the purpose of providing legal advice | | WP |
| LCI PRIV 01078 | 10/01/07 | Sidney Bluming | Greg LeMond | | Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding litigation strategy. | | AC/WP |
| LCI PRIV 01079 | 10/01/07 | Sidney Bluming | Greg LeMond | | Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding litigation strategy. | | AC/WP |
| LCI PRIV 01079 - LCI PRIV 01080 | 10/01/07 | Greg LeMond | Sidney Bluming | | Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding litigation strategy. | | AC/WP |
| LCI PRIV 01080 - LCI PRIV 01081 | 10/01/07 | Sidney Bluming | Greg LeMond | | Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding litigation strategy. | | AC/WP |

| Bates number | Date | Author | To | Copied | Privilege Description | Reason |
|------------------------------------|----------|---------------------------|--------------------------------------|------------------------------|---|--------|
| LCI PRIV 01081 - LCI PRIV 01082 | 10/01/07 | Greg LeMond | Sidney Bluming | | Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding litigation strategy. | AC/WP |
| LCI PRIV 01083 | 10/01/07 | Sidney Bluming | Greg LeMond | | Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding litigation strategy. | AC/WP |
| LCI PRIV 01083 - LCI PRIV 01084 | 10/01/07 | Greg LeMond | Sidney Bluming | | Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding litigation strategy. | AC/WP |
| LCI PRIV 01085 | 06/21/07 | Sidney Bluming | Greg LeMond | | Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding trademarks and communications with trademark counsel. | AC/WP |
| LCI PRIV 01085 | 06/21/07 | Marisol Lopez- DaRosso | Greg LeMond Marisol Lopez-DaRosso | Sid Bluming Amy Goldsmith | Confidential e-mail communication between paralegal and client with copy to attorneys for the purpose of providing legal advice regarding trademarks. | AC/WP |
| LCI PRIV 01085 - LCI PRIV 01086 | 03/28/07 | Marisol Lopez- DaRosso | Greg LeMond | Sid Bluming Amy Goldsmith | Confidential e-mail communication between paralegal and client with copy to attorneys for the purpose of providing legal advice regarding trademarks. | AC/WP |
| LCI PRIV 01086 | 12/19/06 | Amy Goldsmith | Greg LeMond | Marisol Lopez- DaRosso | Confidential e-mail communication between attorney and client with copy to paralegal for the purpose of providing legal advice regarding trademarks. | AC/WP |
| LCI PRIV 01086 | 11/08/06 | Amy Goldsmith | Greg LeMond | Marisol Lopez- DaRosso | Confidential e-mail communication between attorney and client with copy to paralegal for the purpose of providing legal advice regarding trademarks. | AC/WP |
| LCI PRIV 01087 | 10/25/06 | Amy Goldsmith | Greg LeMond | Marisol Lopez- DaRosso | Confidential e-mail communication between attorney and client with copy to paralegal for the purpose of providing legal advice regarding trademarks. | AC/WP |
| LCI PRIV 01088 | 06/25/07 | Chris Madel | Greg LeMond | | Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding litigation strategy. | AC/WP |

| Bates number | Date | Author | To | Copied | Privilege Description | Reason |
|----------------|----------|----------------|-------------|------------------------------|---|--------|
| LCI PRIV 01089 | 12/21/07 | Sidney Bluming | Greg LeMond | Chris Madel Bruce Manning | Confidential e-mail communication between attorney and client with copy to attorneys for the purpose of providing legal advice regarding litigation strategy. | AC/WP |

AC = Attorney Client Privilege
 WP = Work Product Doctrine